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April 26, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**Re: Request of Clifton Power Company on the Public Service Commission's
Jurisdiction of Electric Vehicle Charging Stations
Docket No. 2021-210-E**

**Petition to Intervene of Duke Energy Carolinas, LLC and Duke Energy
Progress, LLC**

Dear Ms. Boyd:

In accordance with S.C. Code Ann. Regs. 103-823, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC hereby submit the enclosed Petition to Intervene in the above-referenced docket.

Sincerely,

A handwritten signature in blue ink that reads "Katie M Brown". The signature is written in a cursive, flowing style.

Katie M. Brown

Enclosure

cc: Parties of Record

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-210-E

IN RE:

Request of Clifton Power Company)
on the Public Service Commission's)
Jurisdiction of Electric Vehicle)
Charging Stations)
_____)

**PETITION TO INTERVENE OF DUKE
ENERGY CAROLINAS, LLC AND DUKE
ENERGY PROGRESS, LLC**

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies”) hereby petition the Public Service Commission of South Carolina (the “Commission”) for permission to intervene in the above-captioned proceeding pursuant to S.C. Code Ann. Reg. 103-825 and other applicable provisions of the Commission’s Rules of Practice and Procedure. In support of this Petition, the Companies show the following and request the following relief:

1. DEC is a public utility engaged in the generation, transmission, distribution, and sale of electric energy in the western portion of South Carolina and central and western portions of North Carolina. It is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEC is also authorized to transact business in North Carolina and is a public utility under the laws of that state. Accordingly, its operations in North Carolina are subject to the jurisdiction of the North Carolina Utilities Commission. DEC’s address is Duke Energy Carolinas, LLC, 526 S. Church Street, Charlotte, NC 28202.

2. DEP is a public utility engaged in the generation, transmission, distribution, and sale of electric energy in the eastern portion of South Carolina and western portions of North Carolina. It is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEP is also authorized to transact business in North Carolina and is a public utility under the laws of that state. Accordingly, its operations in North Carolina are subject to the jurisdiction of the North Carolina Utilities Commission. DEP's address is Duke Energy Progress, LLC, 410 S Wilmington Street, Raleigh, NC 27601.
3. The attorneys for the Companies, to whom all correspondence and any other matters relevant to this proceeding should be addressed, are:

Sam Wellborn
Associate General Counsel
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4. On June 22, 2021, Clifton Power Company filed a letter requesting the Commission opine on its jurisdiction regarding: a) the manufacturing, siting, developing, installing, commissioning and/or operating the electric vehicle charging stations other than by electric utilities i) when the power is supplied – directly or indirectly – by a regulated utility and ii) when the power is supplied – directly or indirectly – by a Commission unregulated

utility; b) if the power is supplied to the charging station only after being “treated” (stored in a battery before being provided) does that have any impact to the Commission’s jurisdiction; c) if the charging stations deliver power at any frequency other than 60 AC Hz or DC power, does the Commission have any jurisdiction; and d) if the EVSC changes the characteristics of the power in any way, does the Commission have jurisdiction.

5. On March 10, 2022, the Commission issued Order No. 2022-164 instructing the Clerk’s Office to set this matter for hearing and provide prefiled testimony guidelines, including an intervention date.
6. On March 31, 2022, the Clerk’s Office issued a Notice of Filing and Hearing setting the intervention date for April 27, 2022.
7. The Companies have a real and substantial interest in the subject matter of the above-captioned proceeding, in that the outcome of the proceeding could impact regulated utilities like the Companies. As public utilities, the Companies’ interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, the Companies submit that good cause exists for the Commission to allow the Companies to participate as intervenors in the above-captioned proceeding.
8. The Companies have not developed a final position in this matter, but reserve the right to modify, amend or expand any position the Companies develop during the course of this proceeding, including any position espoused herein.

WHEREFORE, for the reasons set forth above, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission enter an order 1) granting the Companies’ the right to intervene in this docket and any hearing scheduled in this matter, 2) granting the Companies all rights provided to intervenors under the Commission’s Rules and South

Carolina law, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and 3) granting such other and further relief as is just and proper.

Dated this 26th day of April, 2022.

Sam Wellborn
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s/Katie M. Brown

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Attorneys for Duke Energy Carolinas, LLC and
Duke Energy Progress, LLC

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-210-E

IN RE:

Request of Clifton Power Company on the
Public Service Commission's Jurisdiction of
Electric Vehicle Charging Stations

CERTIFICATE OF SERVICE

The undersigned, Lyndsay McNeely, Paralegal for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, does hereby certify that she has served the persons listed below with a copy of Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Petition to Intervene in the above-captioned proceedings via electronic mail at the addresses listed below on April 26, 2022.

Alexander Knowles
Office of Regulatory Staff
aknowles@ors.sc.gov

Carri Grube Lybarker
SC Department of Consumer Affairs
clybarker@scconsumer.gov

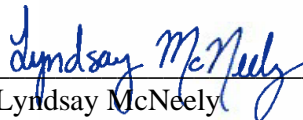
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Dated this 26th day of April, 2022.


Lyndsay McNeely